

1 RENNE SLOAN HOLTZMAN & SAKAI, LLP
LOUISE H. RENNE (36508)
2 lrenne@publiclawgroup.com
INGRID M. EVANS (179094)
3 ievans@publiclawgroup.com
RANDY E. RIDDLE (121788)
4 rriddle@publiclawgroup.com
DAVID L. CHENG (240926)
5 dcheng@publiclawgroup.com
50 California Street, Suite 2100
6 San Francisco, CA 94111-4624
Telephone: 415/678-3800
7 415/678-3838 (fax)

8 Attorneys for Defendant Dorothea Bacon, by and through
Mollie M. Moroney, as Conservator of the Person and
9 Estate of Dorothea Bacon

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13	AIG ANNUITY INSURANCE COMPANY)	Case No. C-06-4308(PJH)
14)	
15	Plaintiff,)	STIPULATION AND [PROPOSED]
16	vs.)	ORDER CONTINUING CASE
)	MANAGEMENT CONFERENCE AND
)	ASSOCIATED DATES
17	DOROTHEA BACON, an individual, by and)	
18	through MOLLIE M. MORONEY, as)	Complaint Filed: July 13, 2006
	Conservator of the Person and Estate of)	Trial Date: None Set
19	DOROTHEA BACON, and Does 1-100)	
)	
20	Defendant.)	

21 This Stipulation is made with reference to the following facts:

- 22 1. A Case Management Conference is scheduled for October 19, 2006, at
23 2:30 p.m. in this action;
- 24 2. The disclosures required by Rule 26(a) of the Federal Rules of Civil
25 Procedure are currently due on or before October 12, 2006;
- 26 3. Defendant Dorothea Bacon, an individual, by and through Mollie M.
27 Moroney, as Conservator of the Person and Estate of Dorothea Bacon, filed a Motion to Dismiss
28 Plaintiff AIG Annuity Insurance Company's First Amended Complaint, and Motion to Strike

Portions of the First Amended Complaint, and that motion is currently set for hearing on October 25, 2006, at 9:00 a.m.

4. The parties have agreed that the Case Management Conference and Rule 26(a) disclosures may be deferred until after the Court rules on the pending motion to dismiss and motion to strike.

5. Accordingly, the parties, through their respective attorneys of record, stipulate as follows:

a. The Case Management Conference currently set for October 19, 2006, may be continued to November 16, 2006 at 2:30 p.m., or to a date convenient to the Court after the Court rules on defendant's motion to dismiss and motion to strike.

b. The disclosures required by Rule 26(a) of the Federal Rules of Civil Procedure may be continued to a date based upon the continued date of the Case Management Conference, or such later date as ordered by the Court.

Dated: September 27, 2006 RENNE SLOAN HOLTZMAN & SAKAI, LLP

By /s/ Ingrid M. Evans

Ingrid Evans
Attorneys for Defendant

Dated: September 27, 2006 MORRISON & FOERSTER LLP

By /s/ Rebecca Kruse

Rebecca Kruse
Attorneys for Plaintiff
AIG Annuity Insurance Company

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/s/) within this e-filed document.

/s/ Ingrid M. Evans

ORDER

IT IS SO ORDERED that the Case Management Conference set on October 19, 2006, is continued to November 16, 2006 at 2:30 p.m. and disclosures required by Rule 26(a) of the Federal Rules of Civil Procedure are to be exchanged in accordance with Rule 26.

Dated: 9/28/06

PHYLLIS J. HAMILTON
United States District Judge

